

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
Baltimore Division

**ALBERT SNYDER** :  
:  
Plaintiff : Civ. No. 1:06-cv-01389-RDB  
:  
v. :  
:  
**FRED PHELPS, et al.** :  
:  
Defendant. : :

**DEFENDANTS' CONSENT MOTION FOR AN ADDITIONAL BUSINESS DAY TO  
FILE SUMMARY JUDGMENT MOTION AND PROPOSED JURY QUESTIONNAIRE**

Defendants Fred W. Phelps, Sr., and Westboro Baptist Church (collectively, Defendants), respectfully move, by consent of all parties, for leave to have an additional business day, through September 4, 2007, to file their summary judgment motion and proposed jury questionnaire. On August 31, 2007, all parties consented to this motion via e-mail from Plaintiff's counsel Sean Summers, and by phone with *pro se* Defendant Shirley Phelps, who confirmed that *pro se* Defendant Rebekah Phelps similarly consents.

The grounds for this Motion include that Defendants plan to file both of the above-listed documents under seal -- so as to avoid any claim that the confidentiality order in this case has been violated. While it might have been possible for Defendants to file said documents electronically by the end of the night on August 31 (the current filing deadline), undersigned counsel did

not have such time availability to have those documents completed in time to have it received by the Court by courier on August 31.

WHEREFORE, Defendants respectfully move to have until September 4, 2007, to file their summary judgment motion and proposed jury questionnaire.

Respectfully submitted,

/s/  
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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document was served by first-class mail, postage-prepaid, on August 31, 2007, to:

Sean E. Summers, Esq. (also by the CM/ECF filing system)

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/s/  
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Jonathan L. Katz